

STCW Frequently Asked Questions: Grandfathering, Transition, Effective Dates

1. **Can mariners already in the system choose to be evaluated under the new requirements when it benefits them prior to January 2017? It is my understanding that they have a choice.**

The grandfathering provisions found in 46 CFR 11.301(g)(3) for STCW officer endorsements are an important part of this Final Rule. They permit mariners who commence service or training before March 24, 2014, to use the existing requirements until January 1, 2017, if they choose. The changes to the national credentials will be phased in over a 5-year period starting March 24, 2014, consistent with the Coast Guard's normal approach to implementing credentialing rules.

2. **Do I have to wait for these regulations to take effect on March 24, 2014, or can I ask to be evaluated under the new regulations now?**

Mariners who have service or training before March 24, 2014, may elect to be evaluated under all of the requirements of the new rules. However, such evaluations will not be conducted until after March 24, 2014. This will allow a period of time for the Coast Guard to fully prepare for the implementation of the Final Rule.

3. **As I am reading through Subpart C – STCW Officer Endorsements 11.301(g)(2), it appears that “EXCEPT AS NOTED BY THIS SUBPART,” anyone who currently holds an STCW officer’s endorsement prior to March 24, 2014, will not be required to complete any additional training required under this part to retain the endorsement until January 1, 2017. Does this also exempt them from the requirement to have 1 year of sea service in the last 5 years, AND demonstrate continued professional competence by approved assessments conducted ashore for “11.302 (b) Basic Safety Training,” “11.303 (b) Advanced Fire Fighting,” and “12.613 (b) Proficiency in Survival Craft” until after 1 January 2017?**

Until January 1, 2017, mariners may provide evidence of having maintained the minimum standards of competence in basic training (formerly named basic safety training) by complying with 46 CFR 11.202(b) of the regulations in effect before publication of this Final Rule or documenting 12 months of service within the last 5 years. After January 1, 2017, mariners must provide evidence of maintaining the standards of competence in basic training, advanced firefighting, and proficiency in survival craft and/or fast rescue boats every 5 years.

- 4. Is March 24, 2014, the date when engineers holding valid STCW operational-level endorsements need to take courses in order to upgrade to management-level endorsements?**

Applicants who apply for management-level engineer endorsements and who began their service or training before March 24, 2014, will not have to provide evidence of taking leadership & managerial skills training until January 1, 2017. If the applicant begins training or service on or after March 24, 2014, he or she will have to comply with the requirements in 46 CFR 11.327.

- 5. Transition period. Rear Admiral Servidio's December 24, 2013, announcement of the final rulemaking action states, "The opportunity to use the requirements in effect before March 24, 2014, will only be available for one transaction during the STCW or national transition period." I was not able to find that "one and done" limitation specified in the transitional provisions of 11.301(g) or other references to grandfathering in the rules. How is that restriction going to be publicized and enforced?**

Information on the transition will be published in the forthcoming NVIC 02-14 on grandfathering and transitional provisions for merchant mariner credentials.

- 6. (**ADDED 02/14/14**) Do mariners who hold an STCW endorsement issued before 24 March 2014, have to complete any additional training before 1 January 2017.**

Mariners seeking to renew an STCW endorsement to be valid on or after 1 January 2017 may be required to complete training in order to ensure they do not receive a limitation. Not all endorsements require additional training; please see NVIC 02-14 for a listing of required training for your endorsement.

- 7. (**ADDED 02/14/14**) Does NVIC 02-14, "Grandfathering and Transitional Provisions for Merchant Mariner Credentials," apply to all tankermen or only seagoing tankermen?**

There are specific provisions in enclosure (1) of NVIC 02-14 that pertain to all tankermen, as well as provisions in enclosure (2) for those tankermen to which STCW applies.

8. **(**ADDED 02/14/14**) Endorsement as Master, less than 500 GT. Under the regulations in effect prior to 24 March 2014, a mariner who currently holds a national endorsement for service on vessels of 100 GRT or 200 GRT can upgrade directly to an international 500GT/1,600 GRT master's endorsement. However on or after 24 March 2014, existing mariners will have to comply with Table 1 to 46 CFR 11.311(d) in order to obtain the endorsement. Can mariners continue to apply under the regulations in effect prior to 24 March 2014, until 31 December 2016, or will they be required to comply with the new regulations on or after 24 March 2014?**

Candidates who apply for an endorsement based on approved or accepted training or approved seagoing service that was started before 24 March 2014, may qualify under the requirements existing before that date. This includes the assessments published prior to 24 March 2014, as well as the additional requirements for the STCW endorsement section. See NVIC 02-14.

9. **(**ADDED 07/07/14**) STCW Gap Closing Training: Please clarify how a mariner calculates what is their personal deadline to complete the two types of new STCW training - the "Gap Closing" courses such as "Leadership" and the refresher courses such as "BT"?**

The gap closing requirements are specified under the individual requirements for a credential to be valid after 1 January 2017, as described in the regulatory changes that will enter into force on 24 March 2014. Mariners who do not meet the gap closing requirements at the time of application will be issued an STCW endorsement not valid after 31 December 2016. However, the Coast Guard is cognizant that there are mariners whose credentials were issued before 24 March 2014 without limitation. These mariners will be required to meet the gap closing requirements at the next renewal.

10. **(**ADDED 07/07/14**) Will the USCG accept completion of a USCG approved Bridge Resource Management or Engine Resource Management course along with 6 months of sea time as Officer in Charge of the Navigational or Engineering Watch following completion of the course as evidence of meeting the standard of competence in leadership and team work for existing mariners who have an STCW credential issued before 24 March 2014?**

In order to be accepted as meeting the requirements for Leadership and Teamworking Skills, a course must be specifically approved as having met the standard of competence in Sections A-II/1 and/or III/1 of the STCW Code.

NOTE: Please note that the requirement in Leadership and Teamworking Skills is to demonstrate the standard of competence, and it is not necessary to complete approved training. Accordingly, this can be accomplished by a shipboard assessment by a Qualified Assessor. The recently published NVICs for OICNW and OICEW include the assessments for Leadership and Teamworking Skills. Mariners who hold OICNW or OICEW that must demonstrate competency in Leadership and Teamworking Skills for their endorsements to be valid after 31 December 2016 may do so by completing the corresponding OICNW or OICEW assessments.

11. (ADDED 07/07/14**) What constitutes training? It is clear that students who started training before or after 24 March 2014 fall into certain categories, but what constitutes training? When a mariner started collecting seetime towards a license or an upgrade and spends time on the bridge for in-house training? When a mariner started the KUP's? When a mariner went to school? When a mariner submitted for an upgrade?**

Training is considered Coast Guard approved or accepted training as indicated in 46 CFR 11.301(g). A mariner will be considered to have started service on the first day of their service that meets the requirements for the endorsement they have applied for. Training is considered to have started on the first day of the approved or accepted training used to qualify for an endorsement.

12. (ADDED 07/07/14**) Regarding the grandfathering and transitional provisions of 46 CFR 11.301(g) and NVIC 02-14, can an existing mariner who is required to complete gap closing requirements, with a limitation causing their credential to expire on 31 December 2016, submit their gap closing requirements after 31 December 2016 and have the limitations removed and validity of their credential extended to the 5 year expiration date of the current MMC?**

Yes. The STCW endorsement will become valid until the expiration of the MMC once the Coast Guard receives documentation of completion of the gap-closing requirements. (See 46 CFR 11.301(f)(2).)

13. (ADDED 07/07/14**) I hold a national 1,600 GRT near-coastal mate's endorsement, with no STCW endorsement. I reviewed the checklist on the NMC website for the STCW version of Mate (500 GT or more operational level), which I qualify for. Since my sea time was obtained before 24 March 2014, which requirements would be for me?**

Because your sea service commenced before 24 March 2014, you should meet the following from the checklist: “general requirements”; “sea service requirements”; “competencies” found in CG-543 Policy Letter 11-07; and “other requirements (all applicants).”

14. (ADDED 07/07/14**) Regarding the grandfathering and transitional provisions of 46 CFR 11.301 (g) and NVIC 02-14, does a mariner who qualifies for a credential (i.e., STCW management level credential) based upon service or training prior to 24 March 2014 have to have successfully completed all Coast Guard examinations by 1 January 2017?**

No. If a mariner in this situation has met all other application requirements (including STCW) and has been approved to test for the national endorsement, he or she would be examined under the regulations at the time he or she is approved to test, until 24 March 2019 when the transitional provisions for the national endorsement ends.

15. (ADDED 07/07/14**) Renewal of STCW officer endorsement: If a management level officer has sea service that began before 24 March 2014, must he or she complete the ERM/BRM and leadership and management courses when renewing his or her endorsement before 1 January 2017?**

No. However, those mariners seeking a renewal will receive a limitation on their endorsement indicating that it will not be valid after 31 December 2016.

16. (ADDED 07/07/14**) Regarding the grandfathering and transitional provisions of 46 CFR 11.301 (g) and NVIC 02-14, can a mariner with an OICNW/third mate unlimited endorsement with no training towards the STCW management level endorsement before 24 March 2014, and who upgrades to an endorsement as OICNW/second mate unlimited after that date, then upgrade to chief mate unlimited (STCW deck management level) using the previous regulations or will he or she be required to upgrade using the new regulations, provided it is done by 1 January 2017? Will other options be available under future NVICs? We believe the sea time as OICNW before 24 March 2014 enables the mariner to take advantage of the grandfathering and transition provisions under the new regulations.**

Generally, a mariner must have obtained at least one day of qualifying service for the endorsement you are seeking before 24 March 2014, or have begun at least part of the training required for the endorsement you are seeking before that date in order to be eligible for grandfathering under the previous regulations. In the case of a mariner with a national officer endorsement as second mate of unlimited tonnage who wishes to upgrade to chief mate of unlimited tonnage, 46 CFR 11.405(a) specifies that all sea service to qualify for chief mate must be obtained while holding an endorsement as second mate. Accordingly, if a mariner upgrades to second mate after 24 March 2014 he or she would not be eligible for grandfathering if they later upgrade to chief mate, and will be evaluated for chief mate under the new regulations.

17. (ADDED 07/07/14**) I hold a national chief engineer (limited) and STCW endorsement. As I read the new regulations, if I renew before 1 January 2017 I do not have to take the engineroom resource management, leadership and managerial skills, or management of electrical and electronic control equipment courses until my next renewal after 1 January 2017. Is that correct?**

No, you must complete the training in order for your STCW endorsements to remain valid after 31 December 2016. If you renew before 1 January 2017 and have not completed the training, your endorsement will have the limitation “not valid after December 31, 2106” placed on it. See 46 CFR 11.325 or 11.331 as applicable.

18. (ADDED 07/07/14**) Assessments for STCW endorsements:** In most of the new NVICs, it says, “Mariners who began training or service for an endorsement as xxx before 24 March 2014 will not be required to provide assessments until 1 January 2017.” Does this mean that an application must be submitted before 1 January 2017, or that the application must be completely evaluated, testing completed and the MMC issued before that date?

A complete application must be submitted prior to 1 January 2017. See 46 CFR 10.209, 10.225, and 10.231. The Coast Guard may refuse to process an incomplete application. See 46 CFR 10.209(b). If a complete application is not submitted prior to 1 January 2017, all STCW requirements of the new regulations must be met. If the application and associated STCW documentary evidence has been submitted in time and the Coast Guard has not completed the evaluation the applicant will not be held responsible to meet the new requirements for the STCW endorsement. The examinations fall under the requirements for national endorsements and fall under the same 5-year transitional period.

19. (ADDED 05/27/15**) With regard to the new STCW requirement to complete approved training in leadership and managerial skills, I have held an STCW endorsement as master on vessels of 3,000 GT or more since 2003. Does service prior to March 24, 2014, grandfather me from having to complete this training? Would leadership training completed in a company training program exempt me from this requirement?**

No, service before March 24, 2014, does not exempt you from this or any other training required for renewal of your STCW endorsement. In order for your company training program on leadership and managerial skills training to be accepted, it would need to be Coast Guard-approved. Course providers may seek to have their courses retroactively approved to meet the new regulatory requirement. You may check the NMC’s approved course listing to see if your course provider has received retroactive approval for its course.

20. (ADDED 05/27/15**) Why would an OICNW or OICEW endorsement have the limitation “Not valid after December 31, 2016”?**

The final rule add a requirement for all OICNWs (46 CFR 11.309(c)(1)) and OICEWs (46 CFR 11.329(c)) to demonstrate having met the standard of competence for “Leadership and Teamworking Skills” in order for the endorsements to be valid after December 31, 2016. Mariners who have not documented that this standard of competence has been met will receive a limitation indicating that the OICNW or OICEW endorsement is not valid after December 31, 2016. This limitation may be removed at any time by demonstrating the applicable standard of competence, either by completion of a Coast Guard-approved course, or by completing the applicable shipboard assessments specified in NVICs 12-14 or 17-14. In addition to the requirement for Leadership and Teamworking Skills, OICEWs must also complete an approved course for Engineeroom Resource Management (also in 46 CFR 11.329(c)) in order for the OICEW endorsement to be valid after December 31, 2016.

21. (ADDED 05/27/15**) How can a mariner have a limitation removed on an STCW endorsement that indicates it is “Not valid for service on ECDIS equipped vessels after December 31, 2016”?**

The limitation may be removed at any time by showing successful completion of a Coast Guard-approved ECDIS course (see 46 CFR 11.301(f)(2)).

22. (ADDED 05/27/15**) If a mariner is in possession of an ECDIS training certificate that states: “successfully demonstrated competencies of table A-II/I and A-II/2 of the STCW code,” is this acceptable for them to get the ECDIS limitation removed from their MMC?**

Yes. The course completion certificate from a Coast Guard-approved or Coast Guard-accepted ECDIS course is sufficient to remove the limitation on the MMC. We will recognize a course completion certificate from any Coast Guard-approved or Coast Guard-accepted ECDIS course, including those approved or accepted and completed prior to publication of the final rule.

23. (ADDED 05/27/15**) Can someone who is starting their assessments now use Policy Letter 04-02 as long as the assessments are completed by December 31, 2016?**

Yes. Enclosure (4) of NVIC 10-14 describes how a combination of assessments from that NVIC and the former policy letter may be used until December 31, 2016. Similar provisions are also contained in NVICs for other credentials. The Coast Guard will continue to accept assessments from the outdated policy completed before December 31, 2016 until June 30, 2017.

24. **(**ADDED 05/27/15**)** I hold a license and STCW endorsement as chief engineer (limited oceans) and second assistant engineer (unlimited). What are the requirements in order to transition an STCW endorsement as chief engineer (limited) to chief engineer (unlimited)? Will I be covered for STCW requirements for future upgrades including, but not limited to, first assistant engineer (unlimited) (second engineering officer), assuming I've also completed BT/Fire Fighting/PSC, etc.?

If you meet the gap closing requirements found in 46 CFR 11.325(b), your STCW Regulation III/2 endorsement as chief engineer (management level) will remain unchanged. If you have limitations on your STCW endorsement, you will have to complete the outstanding items to remove that limitation. Once you hold an STCW endorsement for Regulation III/2, you will not have further upgrades required for your STCW endorsement.

Those engineers who currently hold a management-level endorsement and started training or service towards the STCW endorsement before March 24, 2014, need only meet the requirements found in the regulations, policy, and practice existing before that date.

However, 46 CFR 11.201(a) requires that you must have the underlying national endorsement in order to serve on vessels of unlimited tonnage. After December 31, 2016, all applicants must meet current requirements found in regulations regardless of when service and training started.

25. **(**ADDED 05/27/15**)** Endorsement renewals: To reinstate a license in the past, mariners were required to take a full course or took a U.S. Coast Guard examination. Recently, I was told that I would also have to submit proof of 90 days of recency and a current CPR/FA card. How does someone reinstating their 1600 GRT endorsement show recency on appropriate tonnage vessels if they don't have an MMC that allows them to work on the vessel?

During the grandfathering and transitional period, the Coast Guard will be using the previous practice for renewal of an MMC after the grace period. That practice recognized the requirements in 10.227(i) and modifies the professional requirement for renewal to require complete examination or training in order to qualify for the MMC - vice the service. Considering that the previous regulations and the current regulations do not have a professional requirement for sea service, the Coast Guard will not be requiring the recent service in 11.201 (c)(2) but will continue the practice of full course or examination.

26. (**ADDED 05/27/15**) I currently hold an OICNW endorsement and am planning on upgrading to Master of Less Than 3,000 GT, but will not have the sea time I need until after 2017. I understand that there are new STCW renewal requirements for Basic Training, Advanced Fire Fighting, Proficiency in Survival Craft, and Fast Rescue Boats that will take effect on the first renewal of an MMC after December 31, 2016. My current MMC is due to expire in 2019. Will I need to meet these new renewal requirements when I seek the raise of grade of my STCW endorsement after December 31, 2016, but before my MMC expires in 2019?

Yes, you must produce evidence of maintaining the standard of competence every 5 years of BT, Advanced Fire Fighting, Proficiency in Survival Craft, and Fast Rescue Boats when you upgrade an endorsement after January 1, 2017, but before the first renewal after that date. 46 CFR 11.302(b) and the STCW Convention require that mariners shall be required, every 5 years, to produce evidence of having maintained the required standard of competence for Basic Training.

27. (**ADDED 05/27/15**) I am due to renew my 1600 GRT master's endorsement in 2016. Do I have to take all the new renewal courses mid-issue or do I just need it for my next renewal in 2021?

There are different requirements that affect your renewals.

If you renew before January 1, 2017, and do not have approved training for Leadership and Managerial Skills, your STCW endorsement will receive a limitation making it not valid after December 31, 2016. Also, if you have not completed training for ECDIS, your STCW endorsement will have a limitation indicating that it will not be valid on vessels equipped with ECDIS after December 31, 2016.

There are also renewal requirements that take effect on the first credential transaction after December 31, 2016. At that time you will need to show continued competency for Basic Training, Advanced Fire Fighting, Proficiency in Survival Craft, and Fast Rescue Boats. If you have 1 year of service during the previous 5 years, you can take shorter "Revalidation" courses. If you do not have this service, you will need longer "Refresher" courses.

28. **(**ADDED 05/27/15**)** I understand that there are new renewal requirements for Basic Training, Advanced Fire Fighting, Proficiency in Survival Craft, and Fast Rescue Boats that will take effect the first time that I renew my STCW endorsements after December 31, 2016. I also understand that when renewing, I may request that my new MMC be dated up to 8 months in the future to align with the expiration of my current MMC. May I defer the new STCW renewal requirements by applying for renewal before January 1, 2017, and requesting that my new MMC take effect after that date?

Certain STCW requirements must be met by January 1, 2017, or the first renewal thereafter. If you request delayed issuance of your MMC that falls after that date, the STCW requirements cannot be deferred. These requirements include: continued competency for Basic Training, Advanced Fire Fighting, Proficiency in Survival Craft and Fast Rescue Boats, Approved training in Leadership and Managerial skills or the assessment of competence of Leadership and Teamworking skills and ECDIS if serving on vessels with that equipment.

29. **(**ADDED 05/27/15**)** Teamwork and Leadership Skills: The USCG is allowing existing 2nd and 3rd assistant engineers to meet the standard of competence in leadership and teamworking skills by completing tasks 16.1A, 16.2A, 16.3A, and 16.4A in the OICEW record of assessment. Will the mariner be able to submit just those sections of the record of assessment and a certificate for an ERM course to have the Dec 31st, 2016, expiration removed from the STCW-95, or will the mariner need to turn in a fully completed OICEW record of assessment and an ERM course certificate?

Yes, you need only submit proof of Leadership and Teamworking Skills assessments and proof of satisfactory completion of an ERM course in order to extend the validity of your OICEW endorsement past December 31, 2016. It should be noted that ERM and Leadership and Teamworking Skills are two separate requirements.

30. **(**ADDED 05/27/15**)** I hold an endorsement as Master 100 Tons and just renewed my MMC. I took Basic Safety Training in the past, and my old MMC said that I met STCW for domestic voyages. Why is that not on my new MMC?

The Coast Guard no longer includes this endorsement where a mariner is only seeking authority for domestic, near-coastal voyages. The Coast Guard clarified the regulations for those persons operating small vessels engaged exclusively on domestic, near-coastal voyages since they are not subject to any further obligation for the purposes of the STCW Convention. Additionally, the Coast Guard has provided regulations outlining how to obtain an STCW endorsement for near-coastal endorsements, see 46 CFR 11.317.

31. **(**ADDED 05/27/15**)** I have both a Master 3,000 ton endorsement and a 3rd Mate OICNW endorsement. I was informed by the NMC that for my STCW to stay valid after Dec 2016, I would have to complete two courses: Leadership and Managerial skills, and Leadership and Teamworking Skills. Investigating further, I have read that if an individual takes the Leadership and Managerial skills course, that this satisfies the Leadership and Teamworking Skills STCW requirement for OICNW. Is this true?

You are correct. If you are renewing your endorsements and have successfully completed the Leadership and Managerial Skills course, you do not have to meet the standard of competence for Leadership and Teamworking skills.

32. **(**ADDED 05/27/15**)** It is my understanding, based on information found in enclosure (2) of NVIC 12-14, that the assessments for OICNW pertaining to application of Leadership and Team Working Skills can be substituted for an approved training course. It is also my understanding that, until December 31, 2016, anyone holding a master's endorsement and serving as an OICNW is qualified to perform the assessments. Is this correct? See 46 CFR 10.405(a)(3).

In order to facilitate the transition to the new requirement for approval of qualified assessors, the Coast Guard will accept assessments that have been demonstrated in the presence of and signed by an assessor who has not been Coast Guard approved provided that the assessor meets the professional requirements in 46 CFR 10.405(a)(3) to assess competence for the specific endorsement. During this interim period, assessors must be in possession of the level of endorsement, or other professional credential, which provides proof that he or she has attained a level of experience and qualification equal or superior to the relevant level of knowledge, skills, and abilities to be assessed (46 CFR 10.405(a)(3)). Until December 31, 2016, the Coast Guard will accept assessments signed by mariners who hold an appropriate national endorsement and meet the qualifications described in enclosure (2) of NVIC 12-14.